

BRACH | EICHLER LLC

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September 26, 2024

VIA ECF

Magistrate Peggy Kuo, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: State Farm Mut. Auto. Ins. Co., et al. v. Metro Pain Specialists P.C., et al.
Case No.: 1:21-cv-05523-MKB-PK

Dear Magistrate Kuo:

As Your Honor may recall, this firm represents defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA (collectively “Defendants”) in the above referenced matter.

I am writing with regard to Your Honor’s Text Order entered on September 19, 2024 regarding the subpoena served on Nazar Burak, and to confirm that Brach Eichler LLC will be representing Mr. Burak regarding the subpoena. I am therefore respectfully requesting Your Honor permit Mr. Burak to respond to the subpoena on or before October 11, 2024.

As stated in Plaintiff’s Counsel September 18, 2024 letter (Docket No.: 616), Mr. Burak has been seeking counsel to represent him in responding to the subpoena. The subpoena requests communications between approximately ten (10) companies that Mr. Burak is associated with, and various defendants and defendant owned entities in this lawsuit. As such, I am respectfully requesting until October 11, 2024 to provide Plaintiffs with a complete response to the subpoena.

Once the subpoena response is complete, I intend on working with Plaintiffs’ counsel to schedule Mr. Burak’s deposition at mutually convenient date.

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Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Anthony M. Juliano

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